

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GERTRUDE MAE FLYNN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

AIMBRIDGE HOSPITALITY, LLC,

Defendant.

Case No. 2:17-cv-01649-JFC

Judge Joy Flowers Conti

**DECLARATION OF R. BRUCE CARLSON IN SUPPORT OF
UNOPPOSED MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS**

1. I am a partner in the law firm of Carlson Lynch, LLP (hereinafter, "Carlson Lynch"). I submit this Declaration in support of an application for an award of attorneys' fees and costs, in connection with services rendered to the settlement class by Carlson Lynch.

2. The compensation for services rendered by Carlson Lynch in this case has been wholly contingent on the success of this litigation.

3. Attached hereto as Exhibit A is a spreadsheet reflecting the hours spent by my firm working on this case from inception to date, and a list of unreimbursed expenses my firm has incurred in connection with the prosecution of this action. These expenses are reflected in the books and records of this firm maintained in the ordinary course of business. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

4. All the hours reflected in Exhibit A were reasonable and necessary to the prosecution of this case.

5. None of the time included in Class Counsel's fee application is for any work that has been done in connection with the application for fees.

Under penalty of perjury, I declare that the above statements are true and correct.

Executed at Pittsburgh, Pennsylvania this 29th day of March, 2019.

/s/ R. Bruce Carlson
R. Bruce Carlson

EXHIBIT A

FLYNN V. AIMBRIDGE HOSPITALITY, LLC**TIME REPORT****Firm Name:** Carlson Lynch, LLP**Reporting Period:** Inception to date

Categories:

1. Investigations
2. Discovery
3. Pleadings, Briefs and Pretrial Motions (including Legal Research)
4. Court Appearances, including preparation
5. Settlement
6. Litigation Strategy, Analysis and Case Management

ATTORNEY OR PARALEGAL*	1	2	3	4	5	6	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
R. Bruce Carlson (P)	26.5	0	9.75	0	2.0	6.5	44.75	\$650	\$29,087.50
Kelly K. Iverson (P)	0	5.25	14.5	2.75	13.0	6.0	41.5	\$500	\$20,750.00
Kevin Abramowitz (A)	0	0	6.0	0	0	2.0	8.0	\$425	\$3,400.00
Bryan A. Fox (A)	0	0	16.4	0	0	0	16.4	\$400	\$6,560.00
Paralegals	15.5	1.0	0	0	0	3.7	20.2	\$175	\$3,535.00
TOTAL:							130.85		\$63,332.50

*(P) = Partner

(A) = Associate

(PL) = Paralegal

FLYNN V. AIMBRIDGE HOSPITALITY, LLC

EXPENSE REPORT

Firm Name: Carlson Lynch, LLP

Reporting Period: Inception to date

EXPENSE	AMOUNT
Filing Fee	\$400.00
Service	\$79.50
Notice (Website Purchase, Website Design, Mailings)	\$500.00
TOTAL	\$979.50